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MEMORANDUM ENDORSED

MURIEL GOODE-TRUFANT  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Marina Moraru  
Special Assistant Corporation Counsel  
Office: 212) 356-2456

July 9, 2025

**VIA ECF**

Hon. Gregory H. Woods  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, New York 10007

Re: *B.K. v. N.Y.C. Public Schools*, 25-3033 (GHW)(RFT)

Dear Judge Woods:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action until October 9, 2025. Plaintiff has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) by July 11, 2025. On May 2, 2025, the Court granted Defendant's first request for an extension. (ECF 10). (Defendant's deadline to respond to the Complaint is currently August 13, 2025). We note that, while this is an IDEA fees-only case and liability is not at issue, without the relevant billing, Defendant cannot begin its internal settlement review process, which includes review of the underlying administrative record together with the relevant billing records, and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well. Additionally, as this is an IDEA fees-only claim and neither liability nor discovery is at issue, Defendant respectfully requests the adjournment, *sine die*, of the Initial Pretrial Conference ("IPTC") currently scheduled for August 7, 2025, and the attendant submissions. Plaintiff consents to these requests.

Accordingly, Defendant respectfully requests a 90-day stay of this action until October 9, 2025, with a joint status letter due that same date advising the Court of the status of settlement negotiations, and that the Court adjourn the IPTC and attendant submissions, *sine die*.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.

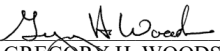
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

Application granted. This case is stayed until October 9, 2025. The parties are directed to file a joint letter by October 1, 2025 regarding the status of settlement negotiations. The initial pretrial conference scheduled for August 7, 2025 is adjourned *sine die*. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 11 and to note the stay of this matter on the docket.

SO ORDERED.

Dated: July 9, 2025  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge